

SeniorNet[®]

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Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentation, CC Docket No. 96-115
Telecommunications Carriers' Use of Customer Proprietary
Network Information and Other Customer Information**

Dear Ms. Dortch:

SeniorNet, who is celebrating 20 years of empowering seniors through technology, would like to applaud the Federal Communications Commission (FCC) for your efforts to properly review the existing rules dealing with telecommunications carrier's use of Customer Proprietary Network Information (CPNI) and other relevant customer information. Protecting individual privacy is an ever-growing concern and the Commission should be commended for taking these steps.

However, we ask that you not overreach and unnecessarily burden America's seniors and all consumers by imposing a mandatory password requirement in order to access account information. Imposing such a requirement would be a great inconvenience to some consumers and especially seniors citizens, ultimately weakening the security of consumers' telephone account information. Today's consumers are overwhelmed by the number of passwords they must remember, manage, and provide in their daily lives. In addition, senior citizens may face additional challenges in attempting to remember and provide passwords over the telephone. For these reasons, mandating password protection of consumers' telephone account information and calling records will not make those records any more secure against pretexters and may hinder consumers' ability to receive the telephone services they want.

Recognizing that the status quo is not sufficient however, SeniorNet would support a rule that would require carriers to *offer* passwords to their consumers. Such a move would work in concert with SeniorNet's mission to empower consumers, providing choice over a mandate.

Finally, SeniorNet believes that consumer education is paramount and strongly recommends that the Commission devote resources to make consumers aware of the practice of pretexting, let them know what industry and government are doing in partnership to combat the problem and what preventative measures individuals can take to safeguard their privacy.

Again, SeniorNet appreciates the work the FCC is doing to curtail criminal behavior and protect consumers in the area of CPNI and pretexting. However, we ask that the Commission not overreact and place unwanted and unnecessary burdens on consumers through the adoption of a rule that would mandate passwords in order to discuss phone records with a carrier.

We look forward to working with you on this and other important consumer measures in the coming months.

Sincerely,



Kristin Fabos
Executive Director, SeniorNet